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June 14, 2022

VIA ECF

Hon. Mary Kay Vyskocil United States District Judge Southern District of New York 500 Pearl Street, Courtroom 18C New York, New York 10007 USDC SDNY
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Re: Diesel S.p.A., et al. v. Diesel Power Gear, LLC (Civil Case No. 19-cv-09308-MKV)

LETTER MOTION REQUESTING APPROVAL OF REDACTED DRAFT 56.1

STATEMENT

Dear Judge Vyskocil,

In accordance with Your Honor's Individual Rules of Practice (the "Individual Rule(s)"), and specifically, Individual Rule 9(B), Plaintiff Diesel S.p.A. and Plaintiff Diesel U.S.A., Inc. (collectively, "DIESEL" or "Plaintiffs") hereby request the Court's approval to redact Plaintiffs' Draft Local Rule 56.1 Statement of Undisputed Facts (the "Draft 56.1 Statement"). The redacted portions of the Draft 56.1 Statement reflect summaries of Defendant Diesel Power Gear, LLC's ("Defendant") sales information, which Plaintiffs created from Defendant's financial documents that were produced to Plaintiffs, with confidential designations pursuant to the Protective Order (*Docket Entry No. 19*), during the course of discovery. Plaintiffs and Defendant, through their respective counsel, have conferred, and Defendant maintains that the summaries of Defendant's sales information should remain confidential. Accordingly, Plaintiffs, upon Defendant's request, have redacted such portions from the Draft 56.1 Statement and are hereby seeking the Court's approval of such redactions.

We thank the Court for its time and consideration.

Respectfully submitted,

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Attorneys for Plaintiff Diesel S.p.A. and Plaintiff

Diesel U.S.A., Inc.

Granted. SO ORDERED.

Date: 6/14/2022 New York, New York

Mary Kay Wskocil United States District Judge